

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



March 14, 2017

Mr. Jimmie Cho, Senior Vice President  
Gas Operations and System Integrity  
Southern California Gas Company  
555 West 5<sup>th</sup> Street, GT21C3  
Los Angeles, CA 90013

GI-2016-02-SDG48-01B

**Subject: General Order (G.O.) 112-F<sup>1</sup> Operation and Maintenance Inspection of San Diego Gas and Electric Company's M&R and Valves Facilities in the Eastern Transmission Region that includes the district of Miramar**

Dear Mr. Cho:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112-F<sup>1</sup> Operation and Maintenance Inspection of San Diego Gas and Electric Company's (SDG&E) Measurements & Regulations (M&R) and Valve Facilities in the Eastern Transmission Region, Inspection Unit (Miramar) on February 22-26, 2016. The inspection included a review of the Inspection Unit's M&R and valves operation and maintenance records for calendar years 2013 through 2015 and field inspections of pipeline facilities in the Miramar district. SED staff also reviewed the Inspection Unit's Operator Qualification records, which included field observation of randomly selected individuals performing covered tasks.

SED staff made five recommendations. The recommendations are noted in the attached "Summary of Inspection Findings".

Please provide a written response within 30 days of your receipt of this letter indicating the measures taken by SDG&E to address the recommendations and concerns noted in the Summary of Inspection Findings.

If you have any questions, please contact Mahmoud (Steve) Intably, at (213) 576-7016.

Sincerely,

A handwritten signature in blue ink that reads "Kenneth A. Bruno".

Kenneth Bruno  
Program Manager  
Gas Safety and Reliability Branch  
Safety and Enforcement Division

CC: Mahmoud (Steve) Intably, SED/GSRB, Matthewson Epuna, SED/GSRB, Kan Wai Tong, SED/GSRB, and Troy Bauer, Sempra Energy Utilities

<sup>1</sup> General Order 112-F was adopted by the Commission on June 25, 2015 via 15-06-044

## **Summary of Inspection Findings**

### **2016 SDG&E Eastern Transmission Region - Inspection Unit (Miramar) February 22-26, 2016**

#### **I. SED Identified Probable Violations**

None

#### **II. Concerns and Recommendations**

1. SDG&E's Gas Standard T8173 Pressure Relief/Pressure Limiting Devices, Testing/Inspection, Section 13.2.1 requires SDG&E's employees to take steps without delay to adjust, repair, replace or install additional devices as appropriate if a relieving device or signaling device test discloses unsafe deviations.

During the field inspection, SED's staff observed that SDG&E's employees in some instances were adjusting the set pressure and in other instances the devices were not adjusted but left without any action even when the deviations in both instances were the same. SED recommends that SDG&E review and revise its Standard T8173 to address "unsafe deviation" and set pressure tolerances/drifts for the relieving devices or signaling devices. SED recommends that SDG&E use manufacturer's recommended tolerances for adjusting the pressure relief and pressure limiting devices.

2. SDG&E's Gas Standard T8167 Valve Inspection and Maintenance – Transmission Section 4.8 requires SDG&E's employees to lubricate the valve only if necessary to ensure an easy operation. SED recommends that SDG&E reconcile the valve lubrication procedure and the required training in the Gas Standard T8167.
3. SDG&E's Gas Standard T8167 Valve Inspection and Maintenance – Transmission Section 4.5 requires SDG&E's employees if applicable, to perform an inspection of the vault. SED recommends that SDG&E reconcile the vault inspection procedure (G8159) and the required training in the Gas Standard T8167
4. SDG&E's Gas Standard T8167 Valve Inspection and Maintenance – Transmission Section 4.6 requires SDG&E's employees to partially operate the valve manually and/or pneumatically. Section 4.7 requires SDG&E's employees if the valve is equipped with a hydraulic actuator, to verify hydraulic fluid level (within manufacturer specified range). It appeared that SDG&E's standard did not address all the operating modes the valves may be subjected in the field. SED recommends that SDG&E review its valve inspection and testing procedure and apply the manufacturer's valve inspection recommendations.
5. SDG&E's Gas Standard T8167 Valve Inspection and Maintenance-Transmission, Section 4.5 requires valve boxes found to be damaged or inaccessible to be repaired or raised as soon as possible. During the field inspection, SED's staff observed that valve number 3011-0.02-3 had a valve box (casing) that was below street grading and resulted in the accumulation of dirt and debris in the valve box. SED recommends that SDG&E take the necessary steps to ensure the valve box's deficiency is corrected.

<sup>1</sup> General Order 112-F was adopted by the Commission on June 25, 2015 via 15-06-044